



Your business  
is our business.

REDACTED - FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200  
Greenbelt, Maryland 20770  
phone: 301-459-7590, fax: 301-577-5575  
internet: www.jsitel.com, e-mail: jsi@jsitel.com

June 26, 2015

Via Hand Delivery

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Accepted / Filed

JUN 26 2015

Federal Communications Commission  
Office of the Secretary

Re: **WC Docket No. 14-58**  
**2015 ETC Annual Report of UBET Telecom Inc.**  
**Study Area Code 502287**

Dear Ms. Dortch:

On behalf of UBET Telecom Inc. ("UBET"), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.<sup>1</sup> UBET seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.<sup>2</sup> The redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 459 of its Progress Report on its Five-Year Service Quality Improvement Plan as required by Section 54.313(a)(1).<sup>3</sup>

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

No. of Copies rec'd 0 + 3  
List ABCDE

<sup>1</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>2</sup> *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 15-712 rel. June 17, 2015 (Protective Order). 47 C.F.R. § 54.313(f)(2).

<sup>3</sup> 47 C.F.R. §§ 0.457, 0.459, 54.313(a)(1).

Echelon Building II, Suite 200  
9430 Research Blvd., Austin, TX 78759  
phone: 512-338-0473, fax: 512-346-0822

Eagandale Corporate Center, Suite 310  
1380 Corporate Center Curve, Eagan, MN 55121  
phone: 651-452-2660, fax: 651-452-1909

6849 Peachtree Dunwoody Road  
Bldg. B-3, Suite 200, Atlanta, GA 30328  
phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane  
Bountiful, UT 84010  
phone: 801-294-4576, fax: 801-294-5124



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Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Federal Communications Commission  
Office of the Secretary

Re: **WC Docket No. 14-58**  
**2015 ETC Annual Report of UBET Telecom Inc.**  
**Study Area Code 502287**  
**Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. ("JSI"), on behalf of its client UBET Telecom Inc. ("Company") hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission's rules,<sup>1</sup> withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).<sup>2</sup>

1. The information for which the Company is seeking confidential treatment is an attachment to the Company's annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission's rules ("Report").<sup>3</sup>
2. Pursuant to Section 54.313(a)(1), Rate-of-Return Eligible Telecommunications Carriers ("ETCs") must file with the Commission a Progress Report on its Five-Year Service Quality Improvement Plan ("Progress Report") which is contained in the attachment to the 2015 Report.<sup>4</sup>
3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

<sup>1</sup> 47 C.F.R. §§ 0.457, 0.459.

<sup>2</sup> 47 C.F.R. § 0.459(b)(1) through (9).

<sup>3</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>4</sup> 47 C.F.R. §§ 54.313(a)(1).

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phone: 801-294-4576, fax: 801-294-5124



4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."<sup>5</sup> The Company's Progress Report updates this information as well as provides maps and detailed information as to whether or not network improvement objectives were achieved at the wire center level. Accordingly, because the Company is a rate-of-return carrier, it must file Progress Reports which contain proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.
6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing

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<sup>5</sup> See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).

the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.

7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. Not applicable.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,



John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)



<b>FCC Form 481 - Carrier Annual Reporting</b> <b>Data Collection Form</b>	<b>REDACTED FOR PUBLIC INSPECTION</b>	<small>FCC Form 481</small> <small>OMB Control No. 3050-0064/OMB Control No. 3050-0019</small> <small>July 2013</small>
---	---------------------------------------	---

<010> Study Area Code	502287	
<015> Study Area Name	UBTA-UBET Communications, Inc	
<020> Program Year	2016	Accepted / Filed
<030> Contact Name: Person USAC should contact with questions about this data	Karl Searle	
<035> Contact Telephone Number: Number of the person identified in data line <030>	4356225472 ext.	JUN 20 2015
<039> Contact Email Address: Email of the person identified in data line <030>	ksearle@stratanetworks.com	Federal Communications Commission Office of the Secretary

<b>ANNUAL REPORTING FOR ALL CARRIERS</b>	54.313 Completion Required	54.422 Completion Required
--	----------------------------------	----------------------------------

<100> Service Quality Improvement Reporting	(complete attached worksheet)	(check box when complete)
<200> Outage Reporting (voice)	(complete attached worksheet)	
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report		
<300> Unfulfilled Service Requests (voice)	0	
<310> Detail on Attempts (voice)		
(attach descriptive document)		
<320> Unfulfilled Service Requests (broadband)	0	
<330> Detail on Attempts (broadband)		
(attach descriptive document)		
<400> Number of Complaints per 1,000 customers (voice)		
<410> Fixed	0.0	
<420> Mobile	0.0	
<430> Number of Complaints per 1,000 customers (broadband)		
<440> Fixed	0.0	
<450> Mobile	0.0	
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	
<510> 502287UT510.pdf	(attached descriptive document)	
<600> Functionality in Emergency Situations	(check to indicate certification)	
<610> 502287UT610.pdf	(attached descriptive document)	
<700> Company Price Offerings (voice)	(complete attached worksheet)	
<710> Company Price Offerings (broadband)	(complete attached worksheet)	
<800> Operating Companies and Affiliates	(complete attached worksheet)	
<900> Tribal Land Offerings (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	(if yes, complete attached worksheet)	
<1000> Voice Services Rate Comparability Certification	Yes <input type="checkbox"/>	
<1010>	(attach descriptive document)	
<1100> Certify whether terrestrial backhaul options exist (Yes or No) <input checked="" type="radio"/> <input type="radio"/>	(if not, check to indicate certification)	
<1110>	(complete attached worksheet)	
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	

**Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet**

*Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

<2000>	(check to indicate certification)	
<2005>	(complete attached worksheet)	
<b>Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet</b>		
<3000>	(check to indicate certification)	
<3005>	(complete attached worksheet)	

**(100) Service Quality Improvement Reporting  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	502287
<015>	Study Area Name	UBTA-UBET Communications, Inc
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Karl Searle
<035>	Contact Telephone Number - Number of person identified in data line <030>	4356225472 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com
<110>	Has your company received its ETC certification from the FCC?	(yes / no) <input type="radio"/> <input checked="" type="radio"/>
	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5	
<111>	year plan" filed with the FCC?	(yes / no) <input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

502287UT112.pdf

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets
- <114> Report how much universal service (USF) support was received
- <115> How much (USF) was used to improve service quality and how support was used to improve service quality
- <116> How much (USF) was used to improve service coverage and how support was used to improve service coverage
- <117> How much (USF) was used to improve service capacity and how support was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.

Yes
Yes
Yes
Yes
Yes
Not Applicable

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	502287
<015>	Study Area Name	UBTA-UBET Communications, Inc
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Karl Searle
<035>	Contact Telephone Number - Number of person identified in data line <030>	4356225472 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com

[illegible]



OMB Control No. 3060-0985/OMB Control No. 3060-0819  
July 2013

<701> Residential Local Service Charge Effective Date  
<702> Single State-wide Residential Local Service Charge

1/1/2015
16.0

01 02 03 04 05 06 07 08 09

[illegible]



FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	502287
<015>	Study Area Name	UBTA-UBET Communications, Inc
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Karl Searle
<035>	Contact Telephone Number - Number of person identified in data line <030>	4356225472 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com

[illegible]

(800) Operating Companies  
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	502287
<015>	Study Area Name	UBTA-UBET Communications, Inc
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Karl Searle
<035>	Contact Telephone Number - Number of person identified in data line <030>	4356225472 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com

<810>	Reporting Carrier	UBTA-UBET Communications
<811>	Holding Company	Not Applicable
<812>	Operating Company	UBTA-UBET Communications

<B13>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation

-- See attached worksheet --

**(900) Tribal Lands Reporting  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	502287
<015>	Study Area Name	UBTA-UBET Communications, Inc
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Karl Searle
<035>	Contact Telephone Number - Number of person identified in data line <030>	4356225472 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com

<910> Tribal Land(s) on which ETC Serves

UTE Indian Tribe - Uintah & Ouray


<920> Tribal Government Engagement Obligation

502287UT920.pdf

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable
Yes

Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes



**(1100) No Terrestrial Backhaul Reporting  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	502287
<015>	Study Area Name	UBTA-UBET Communications, Inc
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Karl Searle
<035>	Contact Telephone Number - Number of person identified in data line <030>	4356225472 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

**(1200) Terms and Condition for Lifeline Customers**  
**Lifeline**  
**Data Collection Form**

FCC Form 481  
 OMB Control No. 3060-0986/OMB Control No. 3060-0819  
 July 2013

<010>	Study Area Code	502287
<015>	Study Area Name	UBTA-UBET Communications, Inc
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Karl Searle
<035>	Contact Telephone Number - Number of person identified in data line <030>	4356225472 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com

502287UT1210.pdf

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- |        |   |                                     |
|--------|---|-------------------------------------|
| <1221> | Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | <input checked="" type="checkbox"/> |
| <1222> | Details on the number of minutes provided as part of the plan,  | <input checked="" type="checkbox"/> |
| <1223> | Additional charges for toll calls, and rates for each such plan.  | <input checked="" type="checkbox"/> |

**(2000) Price Cap Carrier Additional Documentation**

**Data Collection Form**

*Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	
<015>	Study Area Name	502287
<020>	Program Year	UBIA-UBET COMMUNICATIONS, INC
<030>	Contact Name - Person USAC should contact regarding this data	2016
<035>	Contact Telephone Number - Number of person identified in data line <030>	KARI SEARIE
<039>	Contact Email Address - Email Address of person identified in data line <030>	4336229472 ext.
		KSEARIE@stratanetworks.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

**Incremental Connect America Phase I reporting**

- <2010> 2nd Year Certification {47 CFR § 54.313(b)(1)i}  
 <2011a> 3rd Year Certification {47 CFR § 54.313(b)(1)ii}  
 <2011b> Attachment {47 CFR § 54.313(b)(1)ii}

Name of Attached Document(s) Listing Required Information

**Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}**

- <2012> 2013 Frozen Support Calculation {47 CFR § 54.313(c)(1)}  
 <2013> 2014 Frozen Support Calculation {47 CFR § 54.313(c)(2)}  
 <2014> 2015 Frozen Support Calculation {47 CFR § 54.313(c)(3)}  
 <2015> 2016 and future Frozen Support Calculation {47 CFR § 54.313(c)(4)}

**Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}**

- <2016> Certification Support Used to Build Broadband

**Connect America Phase II Reporting {47 CFR § 54.313(e)}**

- <2017> 3rd year Broadband Service Certification  
 <2018> 5th year Broadband Service Certification  
 <2019> Interim Progress Certification  
 <2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

- <2021> Interim Progress Community Anchor Institutions

Name of Attached Document(s) Listing Required Information



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(3000) Rate Of Return Carrier Additional Documentation

Data Collection Form

FCC Form 483

OMB Control No. 3060-0084/OMB Control No. 3060-0819

July 2013

<010> Study Area Code	502287
<015> Study Area Name	UBTA-UBET Communications, Inc
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Karl Searle
<035> Contact Telephone Number - Number of person identified in data line <030>	4356225472 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

- (3010) Progress Report on 5 Year Plan  
Milestone Certification (47 CFR § 54.313(f)(1)(i))

502287UT3010.pdf

Name of Attached Document Listing Required Information

- (3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. ☐

- (3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))

Name of Attached Document Listing Required Information

- (3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))  
(3014) If yes, does your company file the RUS annual report

(Yes/No)  
(Yes/No)



Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

- (3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers) ☒  
(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☒

- (3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

502287UT3017.pdf

Name of Attached Document Listing Required Information

- (3018) If the response is no on line 3014, Is your company audited?

(Yes/No)



If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

- (3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications ☐

- (3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☐

- (3021) Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit ☐

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

- (3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers, ☐

- (3023) Underlying information subjected to a review by an independent certified public accountant ☐

- (3024) Underlying information subjected to an officer certification. ☐

- (3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☐

- (3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

REDACTED FOR PUBLIC INSPECTION

(3000) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

OMB Control No. 3060-0086/OMB Control No. 3060-0019

July 2013

<010> Study Area Code	502287
<015> Study Area Name	UBTA-UBST Communications, Inc
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Karl Searle
<035> Contact Telephone Number - Number of person identified in data line <030>	4356225472 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com

## Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends


<b>Certification - Reporting Carrier</b> <b>Data Collection Form</b>		FCC Form 481 OMB Control No. 3060-0985/OMB Control No. 3060-0819 July 2013
<010> Study Area Code	502287	
<015> Study Area Name	UBTA-UBET Communications, Inc	
<020> Program Year	2016	
<030> Contact Name - Person USAC should contact regarding this data	Karl Searle	
<035> Contact Telephone Number - Number of person identified in data line <030>	4356225472 ext.	
<039> Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com	

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: UBTA-UBET Communications, Inc	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/26/2015
Printed name of Authorized Officer: Karl Searle	
Title or position of Authorized Officer: Chief Financial Officer	
Telephone number of Authorized Officer: 4356225472 ext.	
Study Area Code of Reporting Carrier: 502287	Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	



<b>Certification - Agent / Carrier</b> <b>Data Collection Form</b>		FCC Form 481 OMB Control No. 3060-0885/OMB Control No. 3060-0819 July 2013
<010> Study Area Code	502287	
<015> Study Area Name	UBTA-UBET Communications, Inc	
<020> Program Year	2016	
<030> Contact Name - Person USAC should contact regarding this data	Karl Searle	
<035> Contact Telephone Number - Number of person identified in data line <030>	4356225472 ext.	
<039> Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com	

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

<b>Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: _____	
Signature of Authorized Officer: _____	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: ext. _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

<b>Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: _____	
Name of Authorized Agent or Employee of Agent: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Printed name of Authorized Agent or Employee of Agent: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: ext. _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

REDACTED FOR PUBLIC INSPECTION

## Attachments

**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT - LINE 112**

**Five-Year Network Improvement Plan and  
Progress Report**

**ATTACHMENT REDACTED IN ENTIRETY**



**UBTA-UBET Communications, Inc.'s demonstration of Compliance with Applicable Service Quality Standards and Consumer Protection Rules for voice and broadband services.**

In establishing this certification in its *2005 ETC Order*,<sup>1</sup> the FCC found that an ETC must make "a specific commitment to objective measures to protect consumers."<sup>2</sup> The Commission found that for wireless ETCs, compliance with CTIA's Consumer Code for Wireless Service would satisfy this requirement" and that the sufficiency of other commitments would be considered on a case-by-case basis.<sup>3</sup> In this context, the FCC stated, "to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement."<sup>4</sup>

UBTA-UBET Communications, Inc. ("Company") hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company is subject to consumer protection obligations under the Utah Service Rules for Telecommunications Corporations. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of Utah Public Service Commission which disclose rates, terms and conditions of service to customers; (2) adherence to state consumer protection requirements governing telephone providers which

<sup>1</sup> *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) ("*2005 ETC Order*").

<sup>2</sup> *Id.* at para. 28.

<sup>3</sup> *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: "(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy." *Id.* at n. 71.

<sup>4</sup> *Id.* at n. 72.

require billing procedures (R746-240-4) and procedures for responding to and resolving consumer disputes (R746-240-7); (3) truth-in-billing requirements; and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy. Pursuant to Telecommunications Service Rule R746-240-1.H, the Company provides a copy of "Customer's Statement of Rights and Responsibilities" as approved by the Utah Public Service Commission to all account holders.

The Company is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3.

**UBTA-UBET Communications, Inc.'s demonstration of ability to function in emergency situations for voice and broadband services.**

UBTA-UBET Communications, Inc. hereby certifies that it is able to function in emergency situations as set forth in §54.202(a)(2).<sup>1</sup> The Company's network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. The Company's central office can maintain 8 hours battery reserve rated for peak traffic load requirements, and a permanent auxiliary power unit is installed which can be delivered and connected within four hours. The Company has battery backup at all office locations and in its electronic equipment sites capable of running for a minimum of 8 hours. Length of run time is determined by the equipment serving the area and the number of customers working out of the equipment. Generators are

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<sup>1</sup> Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."



installed at all Central Office locations. They will continue to run as long as the Company has access to fuel. The Company tests the batteries at least once per year.

UBTA-UBET Communications, Inc.'s standby generators and battery back-up support both voice and broadband network equipment should an emergency situation occur.

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(700) Price Offerings including Voice Rate Data  
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	502287
<015>	Study Area Name	UBTA-UBET Communications, Inc
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Karl Searle
<035>	Contact Telephone Number - Number of person identified in data line <030>	4356225472 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com

<701> Residential Local Service Charge Effective Date  
<702> Single State-wide Residential Local Service Charge

1/1/2015
16.0

<703>

[illegible]

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(710) Broadband Price Offerings  
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	502287
<015>	Study Area Name	UBTA-UBET Communications, Inc
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Karl Searle
<035>	Contact Telephone Number - Number of person identified in data line <030>	4356225472 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com

&lt;711&gt;

[illegible]



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(800) Operating Companies  
Data Collection Form  
FCC Form 481  
OMB Control No. 3060-0886/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	502287
<015>	Study Area Name	UBTA-UBET Communications, Inc
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Karl Searle
<035>	Contact Telephone Number - Number of person identified in data line <030>	4356225472 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com
<810>	Reporting Carrier	UBTA-UBET Communications
<811>	Holding Company	Not Applicable
<812>	Operating Company	UBTA-UBET Communications

[illegible]

File Name: 502287UT920  
Study Area Code: 502287  
Study Area Name: UBTA-UBET Communications  
Program Year: 2014

UBTA-UBET Communications' service area includes providing landline services to the UTE Indian Tribe – Uintah & Ouray.

During the year 2014 UBTA-UBET Communications complied with the requirements of 47 CFR § 54.313(a)(9), Tribal Engagement Obligations, including, (i) A needs assessment and deployment planning with a focus on Tribal community anchor institutions; (ii) Feasibility and sustainability planning; (iii) Marketing services in a culturally sensitive manner; (iv) Rights of way processes, land use permitting, facilities siting, environmental and cultural preservation review processes; and (v) Compliance with Tribal business and licensing requirements.

I. §54.313(a)(9)(i) A needs assessment and deployment planning with a focus on Tribal community anchor institutions.

While communication services have been provided to the Tribal community since the early beginning of UBTA-UBET Communications in 1954, and overtime to all Tribal Anchor institutions, the Tribe decided that as a sovereign nation, it needed to have its own fiber between key locations and institutions. Working together, the Tribal government and UBTA-UBET Communications determined the best solution was for UBTA-UBET Communications to place the fiber according to the engineered plans. The fiber was successfully put in place as desired and the network is up and operational.

UBTA-UBET communications works with the Tribe to understand their needs and plans to assure services are available as needed. Services of UBTA-UBET are available to Tribe members and Tribal locations and are provided on a non-discriminatory basis.

II. §54.313(a)(9)(ii) Feasibility and sustainability planning.

UBTA-UBET Communications and the UTE Indian Tribe have been working in cooperation since 1954, together we have proven the feasibility and sustainability of communication services to the Tribal area. Through the needs assessment and deployment planning process the need for fiber facilities to the Tribal Fish Hatchery was identified. Throughout the year 2012 to today, we have worked with the Tribe to place the fiber to the Fish Hatchery. While that project has been delayed due to some right-of-ways not yet acquired, the project remains a unified effort and is moving forward at this time. This fiber project was the result of communicating with the Tribal government regarding the services available versus the services needed.

While placing the Tribal owned fiber to Tribal Anchor Institutions, communications between both parties continued. Those communications identified that for the best use of the fiber and its planned connections, the fiber needed extended beyond the original plan. The feasibility of the extensions was discussed and evaluated and the conclusion was made that the fiber extensions would be sustainable. This collaboration resulted in a fiber architecture connecting the anchor institutions of the Tribe enhancing and sustaining its efforts related to sovereignty. In 2013, fiber was extended and connected essential Tribal locations. These included the Supermarket, coffee shop and the Senior Center.

III. §54.313(a)(9)(iii) Marketing services in a culturally sensitive manner.

Working with the Tribal government and leadership, specific opportunities via current tribal information and education programs have been identified to promote awareness of lifeline services and employment opportunities. This has resulted in improving the dissemination of this important information.

IV. §54.313(a)(9)(iv) Rights of way process, land use permitting, facilities siting, environmental and cultural preservation review processes.

The Tribal government keeps UBTA-UBET Communications informed of the processes required for Rights of Way, land use permitting and facilities siting. UBTA-UBET Communications works with the appropriate Tribal offices and designee to assure full compliance with the Tribal processes.

UBTA-UBET Communications works in unison with the Tribe to assure environmental and cultural preservation needs are not overlooked or harmed.

V. §54.313(a)(9)(v) Compliance with Tribal business and licensing requirements.

During 2014 UBTA-UBET Communications complied with all business licensing requirements, UTERO and all access permitting of the Tribe through-out the year 2014.



**UBTA-UBET Communications, Inc.**  
**P.S.C. UTAH NO. 1**

**1st Revised Sheet No. 28**  
**Cancels Original Sheet No. 28**

**NETWORK ACCESS LINE SERVICE**

**RATES**

Monthly Rate

Per Access Line	<u>Residence</u>	<u>Business</u>
One-Party Service	\$ 16.50 (1FR)	\$ 26.00 (1FB)
PBX Trunk		1 1/2 x Business Access Line Rate (PBXFL)
PBX Outward Only		\$ 26.00 (PBXOW)
Key System		1 1/2 x Business Access Line Rate (PBXFL)
Family Line	\$ 16.50 (1FL)	
Extended Area Service		
Vernal Area (789 & 781)	\$ 1.80 (EASV)	\$ 1.80 (EASV)
Roosevelt Area (722 & 725)	2.25 (EASR)	2.25 (EASR)
Duchesne Area (738)	3.25 (EASD)	3.25 (EASD)
All other areas (454, 353, 247, 545, 646, 848, 548)	5.75 (EASU)	5.75 (EASU)

**CONDITIONS**

The above rates apply to the provision of network access lines which, when connected to a suitable instrument provides access to the telecommunications network.

Instruments must be provided by the subscriber, subject to the conditions described in the Connection With Subscriber-Owned Equipment portion of this tariff.

Additional instruments may be attached to network access lines. The Company reserves the right to limit the number of instruments connected to an access line if they cause interference with the normal operation of the line.

Touch-Tone service is provided only where the facilities are available.

PBX Outward Only allows only outgoing calls from the customer's PBX or Key System. It provides access to 911, dial tone, operator services, and long distance services, but does not allow incoming calls.

**UBTA-UBET Communications, Inc.**  
**P.S.C. UTAH NO. 1**

**1st Revised Sheet No. 75**  
**Cancels Original Sheet No. 75**

**2. RATES**

- A. Baseline Lifeline is a reduction or credit in the local service charges normally paid by qualifying low-income consumers. The reduction to the normal residential one-party rates are as follows:

<u>Residential Access Lines</u>	<u>Monthly Credit or Discount</u>
Federal Baseline Lifeline Reduction	\$ 9.25
Federally Funded Reduction in Local Rate	\$ 2.75
State Matching Local Rate Reduction	\$ 3.50

These reductions or credits are from the normal residential one-party service subscribed to by the consumer. The Federal Baseline Lifeline reduction shall be used to waive the consumer's Federal End-User Common Line Charge or Subscriber Line Charge.

In addition to the above Federal Service Discount, the State may provide an additional discount for eligible consumers, pursuant to Public Service Commission of Utah Rules R746-341. The State Discount is only provided if it is funded through the State's Universal Service Fund.

In no case will the discount exceed the rate charged for the service subscribed to by each individual.

- B. The following services are included:

1. Single party, voice grade access to the Public Switched Network
2. Access to emergency services
3. Access to operator services
4. Access to interexchange services, unless toll blocking is chosen
5. Access to directory assistance
6. Toll Blocking
7. Extended Area Service

- C. Tribal Lifeline

1. Tribal Lifeline will consist of up to an additional \$25 per month, per primary residential connection for qualifying low-income individuals living on qualifying tribal lands.

**UBTA-UBET Communications, Inc.**  
**P.S.C. UTAH NO. 1**

**1st Revised Sheet No. 76**  
**Cancels Original Sheet No. 76**

**LIFELINE (Cont'd)**

**2. RATES (Cont'd)**

**C. Tribal Lifeline (Cont'd)**

2. Tribal Lifeline benefits apply to the primary local residential access line. This additional federal Lifeline support will be provided to reduce the qualifying customer's basic monthly service rate to \$1.00 per month.

**3. LIFE LINE ELIGIBILITY REQUIREMENTS**

- A. An applicant must meet eligibility requirements established in the Public Service Commission of Utah Rules R746-341.
- B. Customer must complete the approved application for the Utah Telephone Assistance Program (UTAP) and submit the application to UTAP program for eligibility certification.
- C. The customer must be recertified annually by the appropriate state agency
- D. The premises at which the residential service is requested is the applicant's principal place of residence.
- E. There is only one telephone line serving the residential premises eligible for the credit. The residential premises shall consist of that portion of an individual house or building or one flat or apartment occupied by a single family or individuals functioning as one domestic unit.

**4. TRIBAL LIFELINE ELIGIBILITY REQUIREMENTS**

- A. Residents of tribal lands who qualify for Lifeline based on the requirements listed below are eligible for the Tribal Lifeline benefit if they participate in one or more of the following programs or meet the traditional lifeline eligibility requirements listed above.
  1. Bureau of Indian Affairs (BIA) general assistance program,



**UBTA-UBET Communications, Inc.**  
**P.S.C. UTAH NO. 1**

**1st Revised Sheet No. 77**  
**Cancels Original Sheet No. 77**

**LIFELINE (Cont'd)**

**4. TRIBAL LIFELINE ELIGIBILITY REQUIREMENTS (Cont'd)**

**A. (Cont'd)**

2. Tribally administered Temporary Assistance for Needy Families block grant program,
3. Head Start programs (only those meeting its income-qualifying standard),
4. National School Lunch Program's free lunch program.

- B. The customer must sign, under penalty of perjury a document certifying that such customer receives benefits from at least one of the programs above, and lives within a qualifying area. In addition, the customer must also agree to notify the Company if that customer ceases to participate in the qualifying program or programs.

**5. FUNDING**

The total cost of providing the State Lifeline program shall be funded from the Utah Universal Service Fund.

**6. REGULATIONS**

- A. The Telephone Assistance Program credit will begin with the next billing cycle of the company following the date the Company receives a valid application from the customer or when new service is established for a qualifying customer.
- B. The regular service connection charge, move and change charge, and regulations applicable to the service offerings specified in the tariff will apply. The service connection charge and move and change charge to change to or from this program due to eligibility status will be waived.

**UBTA-UBET Communications, Inc.**  
**P.S.C. UTAH NO. 1**

**1st Revised Sheet No. 78**  
**Cancels Original Sheet No. 78**

**LIFELINE (Cont'd)**

**6. REGULATIONS (Cont'd)**

**C. The Lifeline credit will be subject to the following restrictions:**

1. Applicant must be head of household or person whose name the property or rental agreement resides.
2. Lifeline credit will only be provided to the applicant's principle residence.
3. The credit will only be applicable for one single residential access line.

**D. Lifeline will not be furnished on a Foreign Exchange (FEX) basis.**

**E. Lifeline service shall not be disconnected for non-payment of toll charges.**

**F. If the consumer chooses "toll blocking", the company will not charge a service deposit. Deposits will not be required if customers choose the toll blocking option. No toll blocking charges will be assessed to Lifeline subscribers.**

**7. The Company will offer Lifeline assistance only during such periods as reimbursement of the discount is available to the Company from Federal and/or State revenue sources.**

**TRIBAL LINK UP**

**1. GENERAL**

Applicable to customers of the Company who apply for basic residential service, and are an eligible resident of Tribal Lands.

**2. DESCRIPTION**

A. Tribal Link Up consists of a discount, for new service connection charges to connect the customer to the local telephone network. Discount may not be taken on service order or connection charges that pertain to deregulated services such as inside wiring or terminating equipment.

B. Tribal Link Up

Residents on qualifying Tribal lands (reservations) who qualify for Tribal Lifeline are eligible for a Link Up benefit of up to \$100. The benefit will apply towards 100% of the connection charges between \$60.00 and \$130.00, which are assessed to begin service at the primary residence of eligible residence. Eligible charges include any charges customarily assessed to connect the subscriber to the network, including line extension charges, zone charges, and special construction charges.

**3. ELIGIBILITY REQUIREMENTS**

A. An applicant must meet all of the following criteria in order to qualify for Link Up.

1. The premises at which the residential service is requested is the applicant's principal place of residence.
2. There is only one telephone line serving the residential premises eligible for this discount. The residential premises shall consist of that portion of an individual house or building or one flat or apartment occupied by a single family or individuals functioning as one domestic unit.
3. An applicant who is an eligible resident of Tribal lands must meet the Tribal Lifeline requirements noted in this tariff in the preceding Lifeline section.



**UBTA-UBET Communications, Inc.**  
**P.S.C. UTAH NO. 1**

**1<sup>st</sup> Revised Sheet No. 80**  
**Cancels Original Sheet No. 80**

**LINK UP (Cont'd)**

3. ELIGIBILITY REQUIREMENTS (Cont'd)
  - B. Link Up will not be furnished on a Foreign Exchange (FEX) basis.
  - C. Lifeline qualifying customers are entitled to a reduction of the connection charges once every twelve (12) months.
4. Link Up Assistance will not apply to:
  - A. Any business service.
  - B. Any optional residential services such as a custom calling feature.
  - C. Any private line services whether for residential use or otherwise.
  - D. Deposits used for the establishment of credit.
  - E. Any monthly recurring charges.
5. The Company will offer Link Up Assistance only during such periods as reimbursement of the discount is available to the Company from Federal and/or State revenue sources.

**UBTA-UBET Communications, Inc. (SAC 502287)**

**Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))**

UBTA-UBET Communications, Inc. dba STRATA Networks hereby certifies that throughout 2014, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream, and currently, it is taking reasonable steps to provide upon reasonable request actual speeds of at least 10 Mbps downstream/1 Mbps upstream broadband service with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas as determined in an annual survey, and that requests for such service are met within a reasonable amount of time.

**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT - LINE 3017**  
**ATTACHMENT REDACTED IN ENTIRETY**